



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

MEMO ENDORSED

February 9, 2023

2/14/23

**BY ECF**

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

So Ordered

Colleen McMahon

**Re: United States v. Laforest, 21 Cr. 272 (CM)**

Dear Judge McMahon:

The Government writes to request an adjournment of the pending pretrial submissions deadline for this case, which is scheduled commence trial on March 13, 2023. A plea hearing has been scheduled for defendants Tatiana and Sanjay Laforest before the Hon. Valerie Figueredo, U.S. Magistrate Judge, on February 21, 2023.

Accordingly, the Government respectfully requests that the Court adjourn the February 10, 2023 deadline for pretrial submissions to February 24, 2023, to obviate the need for the parties to file pretrial filings that will be moot and unnecessary assuming Tatiana and Sanjay Laforest plead as scheduled. The Government further requests that the deadline for oppositions to motions in limine be adjourned to February 28, 2023, and that replies to motions in limine be adjourned to March 3, 2023. The defendants consent to the adjournment. ✓

Respectfully Submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ Matthew R. Shahabian  
Matthew R. Shahabian  
Assistant United States Attorney  
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CC: Counsel of Record (by ECF)

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